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Attorneys for Plaintiff AXS Group LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,

Plaintiff,

v.

INTERNET REFERRAL SERVICES,
LLC, EVENT TICKETS CENTER,
INC., VIRTUAL BARCODE
DISTRIBUTION LLC, ALTAN
TANRIVERDI, and
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT
EVENT TICKETS CENTER, INC.
TO RESPOND TO FIRST
AMENDED COMPLAINT BY 30
DAYS**

**COMPLAINT SERVED:
FEBRUARY 8, 2024**

**CURRENT RESPONSE DATE:
MAY 29, 2024**

**NEW REPOSENSE DATE:
JUNE 28, 2024**

Plaintiff AXS Group LLC (“AXS” or “Plaintiff”) and Defendant Event Tickets Center, Inc. (“Event Tickets”) stipulate and respectfully request that the Court extend the deadline for Event Tickets to answer or otherwise respond to the Complaint by thirty days.

WHEREAS, on January 16, 2024, Plaintiff filed a Complaint in this action

1 against Event Tickets and four other Defendants (ECF No. 1);

2 WHEREAS, on February 8, 2024, Plaintiff formally served Event Tickets,
3 making its answer or response to the Complaint due on February 29, 2024 (ECF No.
4 25);

5 WHEREAS, the parties previously agreed to extend the deadline for Event
6 Tickets to respond to the Complaint from February 29, 2024 to March 30, 2024 (ECF
7 No. 30), from March 30, 2024 to April 29, 2024 (ECF No. 32), from April 29, 2024
8 to May 29, 2024 (ECF No. 35);

9 WHEREAS, Plaintiff filed a First Amended Complaint on May 6, 2024 (ECF
10 No. 39);

11 WHEREAS, the parties have been engaging in discussions to explore a
12 possible resolution of this matter, including the entry of a Stipulated Interim
13 Protective Order to facilitate the exchange of confidential information (ECF No. 37)
14 and several calls between counsel;

15 WHEREAS, having additional time to engage in further discussions will be
16 beneficial to the potential for an early resolution;

17 WHEREAS, AXS and Event Tickets agree to a thirty (30) day extension of
18 time to Event Tickets' deadline to answer or respond to the First Amended Complaint
19 so they can continue discussing a resolution to this matter;

20 THEREFORE, AXS and Event Tickets stipulate to a thirty (30) day extension
21 of time, making Event Tickets' answer or response to the First Amended Complaint
22 due on June 28, 2024.

23 It is so stipulated.

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28 ///

1 Dated: May 28, 2024

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3 By: /s/ J. Michael Keyes
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Attorneys for Plaintiff AXS Group LLC

20 Dated: May 28, 2024

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*Attorneys for Defendant Event Tickets
Center, Inc.*

25 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
26 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
27 content and have authorized this filing.

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2024, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes
J. Michael Keyes, SBN 262281